

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION**

IN RE:) CASE NO. 17-14589-PMM
PEDRO LUIS SANTIAGO) CHAPTER 13
MELENDEZ)
DEBTOR)

**NOTICE OF APPEARANCE PURSUANT TO BANKRUPTCY RULE 9010 (b) AND
REQUEST FOR NOTICES UNDER BANKRUPTCY RULE 2002 REGARDING
PROPERTY DESCRIBED AS 1416 CHURCH STREET, READING, PA 19601 AND
THAT CERTAIN LOAN MORE SPECIFICALLY IDENTIFIED AS LOAN NUMBER
*****1374**

NOW COMES Freedom Mortgage Corporation, by and through its attorney Brock and Scott, PLLC, pursuant to Bankruptcy Rule 9010 and makes its appearance as a secured creditor in this cause and, pursuant to Bankruptcy Rule 2002, requests that it be noticed on all pleadings, documents and hearings; that it receive copies of all documents; and be added to the matrix to be served at the addresses below:

Mario Hanyon
Brock and Scott, PLLC
Attorneys at Law
302 Fellowship Road, Ste 130
Mount Laurel, NJ 08054
pabkr@brockandscott.com

Freedom Mortgage
10500 Kincaid Drive
Fishers, Indiana 46037

Please take notice that the undersigned hereby appears as counsel for Freedom Mortgage Corporation pursuant to Bankruptcy Rule 9010(b). The undersigned's filing of this notice is limited to the instant case noted above and should not be construed as unlimited representation of the

21-06096 BKMFR01



Creditor with respect to any and all matters, proceedings, or actions that may be taken in the instant case or any associated case or proceeding involving the above-named Creditor.

RESPECTFULLY SUBMITTED,

/s/ Mario Hanyon

Mario Hanyon
Attorney at Law (203993)
Brock & Scott, PLLC
302 Fellowship Road, Ste 130
Mount Laurel, NJ 08054
844-856-6646 x4560
704-369-0760
pabkr@brockandscott.com

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice of Appearance has been electronically served or mailed, postage prepaid on August 11, 2021 to the following:

PEDRO LUIS SANTIAGO MELENDEZ
1416 CHURCH ST
READING, PA 19601-1232

Mendelsohn & Mendelsohn, PC
Mendelsohn & Mendelsohn, PC
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tobykmendelsohn@comcast.net

Scott F. Waterman, Bankruptcy Trustee
Chapter 13 Trustee
2901 St. Lawrence Ave, Suite 100
Reading, PA 19606

United States Trustee, US Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

/s/ Mario Hanyon
Mario Hanyon
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